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July 22, 2020

BY ECF

Hon. Denise L. Cote
United States District Judge
Southern District of New York
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, NY 10007- 1312

MEMO ENDORSED

Re: United States v. Danielle Burducea, 19 Cr. 086 (DLC)

Dear Judge Cote,

This letter is respectfully submitted in reply to Your Honor's Order of July 20, 2020 and to respectfully request an adjournment of the sentencing of Ms. Burducea. At this time, it is Ms. Burducea's preference that she be sentenced in an in-court proceeding and she has no objection to the proceeding being conducted as indicated in the Court's Order. With respect to the timing of the sentence, we respectfully ask that the proceeding be adjourned for approximately 30 days. As we had indicated in our previous request, Ms. Burducea recently gave birth to her third child and experienced complications both before and after the birth. She is recovering well, and we anticipate that this will be our final request to adjourn the sentencing. While our sentence memorandum is near completion, we are awaiting medical and therapist records as well as final letters in support of Ms. Burducea which we will incorporate into the memorandum. While office hours for those involved are returning to some semblance of normalcy our efforts to prepare have been thwarted due to the COVID-19 crisis. I have sought and received the Government's consent to this request.

Thank you for your courtesy and patience in this matter.

Respectfully Submitted,


_____/s/____

James Kousouros, Esq.

c.c.

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Noah Solowiejczky
Nicholas Folly
Assistant United States Attorneys

The request for an adjournment of the August 14, 2020 sentencing is denied. The sentencing will occur in Courtroom 18B, 500 Pearl Street. The Government's sentencing submission is due August 5, 2020; the defendant's sentencing submission is due August 11, 7.22.2020.



DENISE COTE
United States District Judge